

J. SCOTT MOEDE, OSB 934816
Chief Deputy City Attorney
scott.moede@portlandoregon.gov
NAOMI SHEFFIELD, OSB 170601
Deputy City Attorney
naomi.sheffield@portlandoregon.gov
Portland City Attorney's Office
1221 SW 4th Ave., Rm. 430
Portland, OR 97204
Telephone: (503) 823-4047
Facsimile: (503) 823-3089
Of Attorneys for Defendant City of Portland

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated,

Case No. 3:20-cv-00917-HZ

DECLARATION OF NAOMI SHEFFIELD

PLAINTIFFS,

v.

CITY OF PORTLAND, a municipal corporation,

DEFENDANT.

I, Naomi Sheffield, Deputy City Attorney representing defendant City of Portland in the above-entitled matter, declare as follows:

1. The following link is video purporting to show the area around the Justice center at approximately 11:00 p.m. on May 29, 2020:

<https://www.facebook.com/keprtv/videos/295582434802244/>.

2. The following is a link to a tweet from @PortlandPolice at 11:03 p.m. on May 29, 2020: <https://twitter.com/PortlandPolice/status/1266611192350400513>

3. The following is a link to a retweet from @PortlandPolice of a tweet by @PDXFire on June 8, 2020 at 12:06 am:

<http://twitter.com/PortlandPolice/status/1269889619018973185>

4. The following is a link to a tweet from @PortlandPolice on June 2, 2020 at 9:05 pm: <http://twitter.com/PortlandPolice/status/1268030988568817664>.

5. The following is a link to a tweet from @MrOlmos on June 4, 2020 at 8:08 pm: <https://twitter.com/MrOlmos/status/1268741564919975936>

6. The following is a link to a tweet from @MrOlmos on June 5, 2020 at 7:51 pm: <https://twitter.com/MrOlmos/status/1269099651375874048>

7. The following is a link to a tweet from @MrOlmos on June 5, 2020 at 8:03 pm: <https://twitter.com/MrOlmos/status/1269102505012543490>

8. The following is a link to a tweet from @PortlandPolice on May 31, 2020 at 6:55 pm: <http://twitter.com/PortlandPolice/status/1267273590208032768>

9. The following is a link to a tweet from @PortlandPolice on June 1, 2020 at 7:24 pm: <http://twitter.com/PortlandPolice/status/1267643115193593856>

10. The following is a link to a tweet from @PortlandPolice on June 3, 2020 at 7:49 pm: <http://twitter.com/PortlandPolice/status/1268374390258851840>

11. The following is a link to a tweet from @PortlandPolice on June 8, 2020 at 7:15 pm: <https://twitter.com/PortlandPolice/status/1270177582441353217>

12. Attached to this declaration as Exhibit 1 is the Order on Plaintiffs' Motion for Temporary Restraining Order, in *Abay, et al. v. City of Denver*, 1:20-cv-01616-RBJ (D. Colo.), Dkt. No. 16.

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13. The following link is video purporting to show the protests on the night of May 31, 2020/morning of June 1, 2020: https://portlandoregon.gov-my.sharepoint.com/:v:/g/personal/cheryl_noll_portlandoregon_gov/EaK4D6taV2hPnAI5QcJvyJQBXTYbx1UooUOL4uOIqkVnlw?e=a6xLGC

14. The following link is video purporting to show part of the protests in downtown Portland on June 2, 2020: https://portlandoregon.gov-my.sharepoint.com/:v:/g/personal/clair_warnock_portlandoregon_gov/Ecr4X-n0ZMpNmPthFbrIYF4B79VQ-sFgljrvE_aUUjV18A?e=g997sG

15. The following link is video purporting to show part of the protests on the night of June 5, 2020: https://portlandoregon.gov-my.sharepoint.com/:v:/g/personal/clair_warnock_portlandoregon_gov/EbVvjOubSKBLvsIoB22IDqoBQtU1BXHFtauwgjlKGl_HbQ?e=Pmlukt

16. The following link is video purporting to show part of the protests on June 6, 2020 at approximately 11:30 pm: <https://youtu.be/5FOgwZOGjrs>

17. The following is a link to a tweet from @BonnieSilkman on June 7, 2020 at 10:19 pm: <https://twitter.com/bonniesilkman/status/1269861579421433856?s=21>

18. The following is a link to a tweet from @PortlandPolice on June 6 at 5:29 pm: <https://twitter.com/PortlandPolice/status/1269426264542085122>

19. The following is a link to a tweet from @MultCoSO on June 7, 2020 pm: <https://twitter.com/MultCoSO/status/1269846784081186816>

20. I make this declaration in support of Defendant's Response to Motion for Temporary Restraining Order and Preliminary Injunction.

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I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.

DATED: June 9, 2020.

/s/ Naomi Sheffield
Naomi Sheffield